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Australian Energy Market Commission
Level 15, 60 Castlereagh St
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27 February 2026

Dear Sir or Madam,

Draft rule determination- Gas cyber security roles and responsibilities for AEMO

AGL Energy (AGL) welcomes the opportunity to provide responses to the Australian Energy Market Commission's (AEMC's) draft determination consultation paper (the Paper). We support the harmonisation of the AEMO's roles and responsibilities with those it has for the electricity sector, providing a strategic and coordinated approach to cyber security in the energy system.

With the increased prevalence of cyber security threats and incidents both domestically and abroad, AGL supports the AEMC's proactive efforts to protect and increase the cyber security resilience of the National Gas Market (NGM). We recognise that the increased digitisation of the Market and the interconnected nature of infrastructure networks, exponentially exposes the system to the threat of cyber security incidents. We note that the energy sector – and its potential cyber weaknesses – as emphasised by several stakeholders is not isolated to the National Electricity Market or the NGM but also includes the Wholesale Energy Market (SA WEM) and Consumer Energy Resources (CER). We recognise the AEMC's staged approach to first establish functions dedicated for the NEM and NGM, but we encourage a holistic and concerted effort to ensure there is resilience and protection across the entirety of the Australian energy sector and therefore support the adoption of this regulation under the WEM.

It appears the AEMC's proposals in this Paper replicate the proposals outlined in the corresponding consultation for the National Electricity Market: Draft rule determination – National Electricity Amendment (Cyber security roles and responsibilities) Rule 2024. We agree it is preferable to pursue a consistent regulatory approach across electricity and gas markets. Accordingly, AGL refers the AEMC to its earlier [response submitted 07 November 2024](#) and reiterates the feedback contained therein. Notwithstanding that AGL raised some concerns in its electricity submission (which are highlighted below), in the interests of consistent frameworks we would be prepared to support a final decision that replicates that adopted for the electricity market

In summary:

- AGL supported the AEMC's draft rule to strengthen cyber security roles in the National Electricity Market, noting the growing cyber risks across the broader Australian energy sector. AGL also noted its support for the expansion of these powers to apply to the NGM.
- AGL endorsed establishing a Cyber Security Incident Coordinator and supported AEMO's role in cyber preparedness, including ongoing industry exercises and improved governance through a collaborative working group for the AESCSF.
- AGL suggested that broader cyber security advisory functions may be better delivered by specialist national organisations, with AEMO's role complemented rather than expanded.
- AGL questioned the added value of AEMO distributing cyber threat information given existing ASD platforms and sought clarity on how this aligns with new national cyber governance structures.
- Most notably, raised concerns about transparency and fairness of cost recovery for the proposed functions, advocating for proportional allocation and clearer justification of projected costs.



AGL notes the Department of Home Affairs is currently undertaking a consultation on the Proposed amendments to enhance the Critical Infrastructure Risk Management Program (CIRMP) Rules.¹ Under these enhancements, the Department has proposed uplifting the cyber-security framework, requiring energy sector entities to comply with *Security Profile 2 of the Australian Energy Sector Cyber Security Framework (AESCSF)*. We anticipate the Enhanced CIRMP Rules (when published) will make the AEMO's role more critical, particularly for the governance and management of the AESCSF, along with the other cyber security roles and responsibility for AEMO in the NEM and NGM.

Thank you for your invitation to comment on this draft determination. If you have any questions in relation to this submission, please contact Emma Holloway, Manager Policy & Market Regulation at eholloway@agl.com.au.

Yours sincerely,

Liam Jones

Senior Manager, Policy & Market Regulation

About AGL

Proudly Australian since 1837, AGL delivers around 4.6 million gas, electricity, and telecommunications services to our residential, small and large business, and wholesale customers across Australia. AGL operates the largest electricity generation portfolio in Australia of any ASX-listed company, with a total operated generation capacity of almost 8000 MW across Australia. AGL is Australia's largest privately-owned hydro power station operator and operates the largest portfolio of renewables and storage assets of any ASX listed company. Since 2006, AGL has invested billions of dollars in the construction and delivery of over 2 GW of renewable and firming capacity in the National Electricity Market.

¹ Australian Department of Home Affairs, Consultation Paper: Proposed amendments to enhance the Critical Infrastructure Risk Management Program Rules (CIRMP Rules): <https://www.homeaffairs.gov.au/how-to-engage-us-subsite/files/consultation-on-enhancements-to-cirmp-rules/consultation-paper-proposed-amendments-enhance-cirmp.pdf>, March 2026.